

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2021 JUL 28 AM 9:10

UNITED STATES OF AMERICA

DEPUTY CLERK

mb

v.

NO. 3:20-CR-484-S

DINESH SAH

ADDENDUM TO PLEA AGREEMENT

The United States of America and the Defendant hereby agree to the following addendum to their February 16, 2021 Plea Agreement (Dkt. 30) as follows:

Regarding the forfeiture, Sah agrees:

1. I agree to forfeit all property constituting, or derived from, any proceeds I obtained, directly or indirectly, as the result of my crime and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation. I admit and agree that each of the following properties constitute proceeds of my offense and/or facilitated the same:

- a. \$26,106.68 in funds seized from Neighborhood Credit Union account ending in -9614 on or about May 14, 2021, maintained in the name of Dinesh Sah;
- b. \$250,000.00 in funds seized from JP Morgan Chase general ledger from wire reversal to closed account ending in -0206 on or about June 9, 2021, maintained in the name of Dinesh Sah;

- c. \$200,064.30 in funds seized from Citibank general ledger from closed account ending in -0591 on or about June 25, 2021, maintained in the name of Dinesh Sah;
- d. The \$50,000.00 transferred on June 1, 2020 to account ending -0583 in the name of Dinesh Sah at Citibank, which may or may not still be contained in the account;
- e. The \$50,000 transferred on June 5, 2021 to account ending in -1107 in the name of Dinesh Sah at State Bank of India, which may or may not still be contained in the account;
- f. The \$130,000.00 in U.S. dollars transferred on August 27, 2020 to account 9864905790 in the name of Sagar Gohill at Wells Fargo Bank, and

- g. The \$120,000 in U.S. dollars transferred on August 24, 2020 to First Integrity Title Westminster CO for the purchase of the residential property located at 18856 W. 93rd Road, Arvada, Colorado 80007;

2. Regarding this property, I agree: a) I obtained or retained it as a result of my offense(s); b) it may be forfeited administratively, civilly, or criminally; c) I will not make a claim to it or oppose its forfeiture, or help anyone else do so; d) to withdraw any previous claims made to the property; e) to sign any necessary documents to ensure that clear title passes to the United States; and f) to testify truthfully regarding this property in any forfeiture proceeding. I also agree not to make or cause anyone else to make a claim to property forfeited by any other defendant in this case.

3. I waive any claims I may have against the United States regarding the seizure and/or forfeiture of the property covered by this agreement.

4. I waive the requirements regarding notice of the forfeiture in the charging instrument (Rule 32.2(a)), announcement of the forfeiture at sentencing, and incorporation of the forfeiture in the judgment (Rule 32.2(b)(4)(B)).

5. I waive any constitutional or statutory challenges to the forfeiture covered by this agreement, including that the forfeiture is an excessive fine or punishment.

DATED this 28th day of July 2021.

PRERAK SHAH
Acting United States Attorney

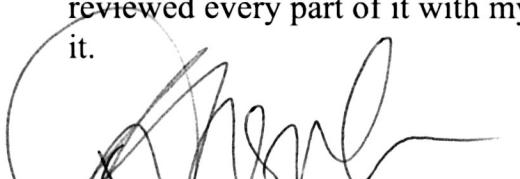

ANNA G. KAMINSKA
Assistant Deputy Chief
Fraud Section, Criminal Division
New York Bar No. 4202958

KATHERINE MILLER
Section Chief
Texas Bar No. 00789107

ERICA HILLIARD
Assistant United States Attorney
Mississippi Bar No. 104224

DIMITRI ROCHA
Assistant United States Attorney
Florida Bar No. 693332

I have read or had read to me this plea agreement addendum and have carefully reviewed every part of it with my attorney. I fully understand it and voluntarily agree to it.

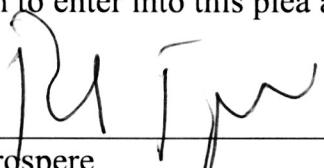


Dinesh Sah
Defendant

7/28/21

Date

I am the defendant's attorney. I have carefully reviewed every part of this plea agreement addendum with the defendant. To my knowledge and belief, my client's decision to enter into this plea agreement addendum is an informed and voluntary one.



Reed Prospere
Attorney for Defendant

7/28/21

Date